

DCP 383:

Provision for Distributors to Move Meters for Service Alterations

Date raised: 10 February 2021

Proposer Name: Paul Morris

Company Name: UK Power Networks

Company Category: DNO

01 – Change Proposal

02 – Consultation

03 – Change Report

04 – Change Declaration

Purpose of Change Proposal:

This Change Proposal seeks to define a process detailing when a Distributor can move a Supplier's meter during service alteration works.



This document is a Consultation issued to DCUSA Parties and any other interested parties in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 383 'Provision for Distributors to Move Meters for Service Alterations

The Working Group recommends that this Change Proposal should proceed to Consultation.

Parties are invited to consider the questions set in section 10 and submit comments using the form attached as Attachment 1 to dcusa@electralink.co.uk by **14 June 2021**.

The Working Group will consider the consultation responses and determine the appropriate next steps for the progression of the Change Proposal (CP).



Impacted Parties: DNOs, IDNOs, Suppliers



Impacted Clauses: Introduction of new Clause

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Timetable

The timetable for the progression of the CP is as follows:

Change Proposal timetable

Activity	Date
Initial Assessment Report	17 February 2021
Consultation Issued to Industry Participants	24 May 2021
Change Report Approved by Panel	21 July 2021
Change Report issued for Voting	23 July 2021
Party Voting Closes	13 August 2021
Change Declaration Issued to the Authority	17 August 2021
Authority Decision	21 September 2021
Implementation	Next DCUSA release following Authority decision



Any questions?

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1 Summary

What?

- 1.1 This proposal is to include provision in the DCUSA to provide a facility for licensed Distributors to move whole current meters as part of customer requested works to alter the service position.
- 1.2 DCUSA (under clauses 25.23 and 25.24) allows Distributors to remove and replace meters as close as reasonably practicable to the original position and this request would extend this facility to allow trained service alteration craftsmen to reposition the meter and associated equipment to a new service position as requested by a customer. While the DUoS e-billing service offers significant advantages, this is a commercial product owned by ElectraLink that Parties must pay to use. ElectraLink's DUoS e-billing service was developed with the intention that the initial price of e-billing is offset by the benefits it brings to Parties' billing practices. For some Parties this cost is justified and manageable, but for some this price is not manageable. The indirect result is that predominantly larger parties with greater revenues have access to the DUoS e-billing service and the benefits it brings, while smaller Parties and market entrants with smaller budgets are outpriced of this service and have no option but to use manual billing.
- 1.3 The proposal would require communication to Suppliers advising when the appointment is made (via the D0368 flow or similar) and should be followed up through the MRA to provide a flow facility to update suppliers of the activity undertaken and confirmation of the new meter location.
- 1.4 The provision will allow:
 - a) The Supplier / meter operator to facilitate the meter move if the customer prefers. This option must be communicated to the customer.
 - b) Where the Distributor chooses not to provide the meter move service, the Supplier will, at the customer's request, arrange to move the meter in coordination with the Distributor's service alteration work.
 - c) Where the Supplier believes it necessary to carry out the meter move work itself it shall notify the Distributors in writing in advance not to provide this service to their customers, on a 'universal' basis.
- 1.5 The scope of this amendment will apply to whole current meter changes only. Where complex / non-standard metering arrangements are encountered and not recognised by the Distributor, these will be flagged for action by suppliers as part of the pre-site survey. This proposal excludes CT metering.

Why?

- 1.6 When customers request a service alteration, the coordination / planning of the physical service alteration and the attendance of the Supplier on the same date to move the meter to maintain supply is often problematic for the customer. This causes lead times for attendance to impact on work dates, leading to customer frustration and negative results from the broad measure of customer satisfaction feedback.
- 1.7 We estimate that during 2020, there were about 15,000 service alterations carried out in the UK, including cut backs, service diversions, and disconnection and new services. These are situations where moving the existing whole current meters (and associated metering equipment) as part of Distributor works can improve the level of service provided to the customer.
- 1.8 Since privatisation, some Distributors have carried out this activity where customers have not been successful in coordinating both Supplier and Distributor, and arrangements are not in place to maintain the metered supply facility. More recently, Distributors have agreed to assist with meter-moves while Supplier / meter operator staff were unable to co-ordinate with Distributors through COVID-related furlough, helping to reduce negative impact on customers and improve their experience.
- 1.9 Enabling this change will provide an opportunity for Distributors to offer a 'one-stop-shop' to customers for service diversions, significantly improving the customer journey through the service diversions process and potentially reducing overall costs.

2 Governance

Justification for Part 1 and Part 2 Matter

- 2.1 This Change Proposal should be treated as a Part 1 Matter as it is likely to have a significant impact on the interests of electricity consumers and it is directly related to the safety or security of the Distribution Network.

3 Why Change?

Background of DCP 383

- 3.1 We estimate that there were circa 15,000 service alterations carried out in the UK during 2020. Where Distributors are both willing and trained to offer a meter-move service to the customer as part of service alteration works, there are opportunities to improve the customer journey by simplifying the coordination of attendance on site and minimising time off supply and the overall inconvenience and cost to the customer.
- 3.2 Extended time frames and delays to the job linked to the coordination of separate appointments will be avoided.
- 3.3 Having one team facilitate the alteration enables resource efficiency and opportunities for cost reduction to the customer.
- 3.4 Where the customer chooses the Distributor to move the meter and has a legacy meter, at survey stage the Distributor could advise the customer of the opportunity to have a smart meter fitted by the Supplier instead.

- 3.5 Where customers require a service alteration for a smart meter, Suppliers currently have no input as to position and are left to manage both the WAN & HAN signal quality following customers' works. As part of service alteration surveys, Distributors can discuss with the customer the WAN & HAN implications of moving the service positions and seek to avoid unduly separating the gas and electricity meter locations.
- 3.6 Maintaining the 'supplier hub principle'. The Supplier has the option to opt out of allowing distributors to offer this service.
- 3.7 Increasing customer choice. The customer can choose a seamless 'one point of contact journey' for service alteration works; including this in the DCUSA enables customer certainty that the movement of the meter is formalised.
- 3.8 Improving competition. Where the Supplier does not opt-out, the proposal offers increased choice to the customer.
- 3.9 Other interested parties: MAP & MAM. DCUSA allows Distributors to take a meter off the wall and replace it and to tighten meter tails (25.23 & 25.24) and so the precedent is therefore set with respect to arrangements between suppliers and the MAP / MAM.
- 3.10 The DCUSA sets out liabilities of parties in relation to direct loss for property damage and can refer to the moving of meters by Distributors under this Change Proposal.

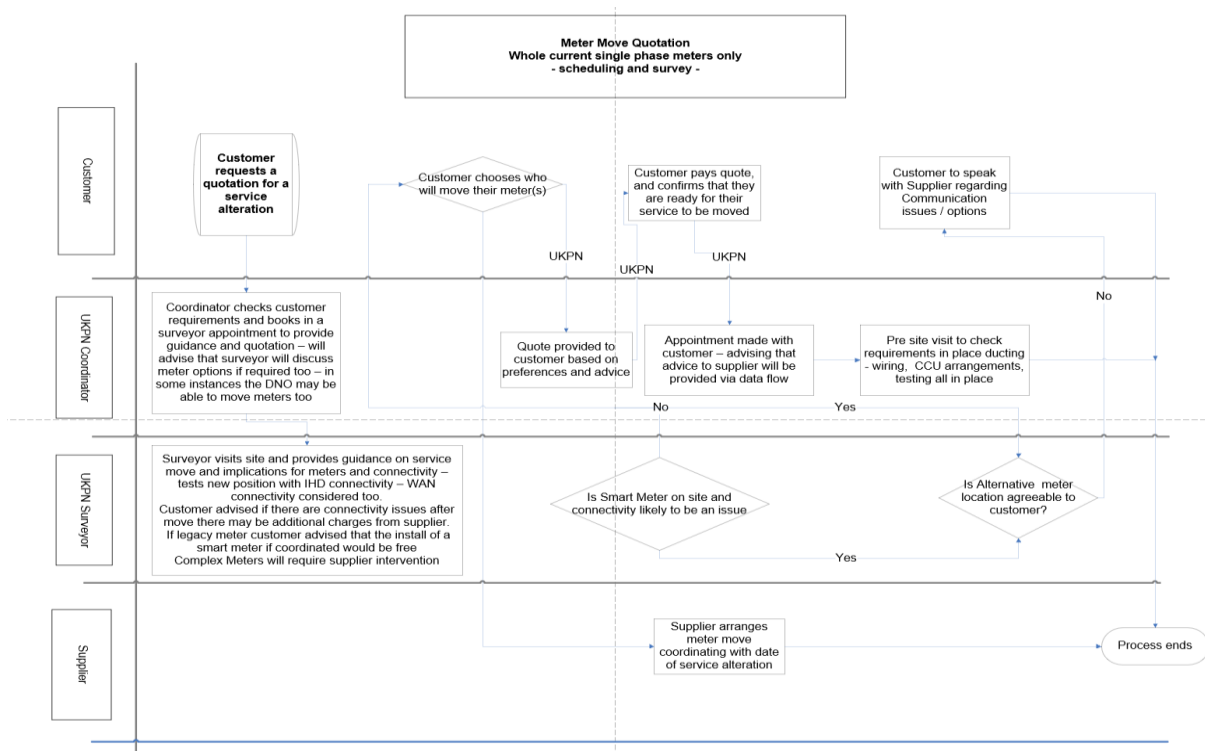
4 DCP 383 Working Group Assessment

- 4.1 The DCUSA Panel established a Working Group to assess DCP 383. This Working Group consists of DNO, Supplier, IDNO and Ofgem representatives. Meetings were held in open session and the minutes and papers of each meeting are available on the DCUSA website – www.dcusa.co.uk.
- 4.2 The Working Group developed and issued a first consultation to gather information and feedback from industry and to aid them in refining the proposed solution.
- 4.3 This Change will apply to both Domestic and I&C customers, however the DNO will only move services within their own licensed areas and will only move meters associated with the service move. The initial scope of the Change, however, will only associate with the 'in scope' section in the table below:

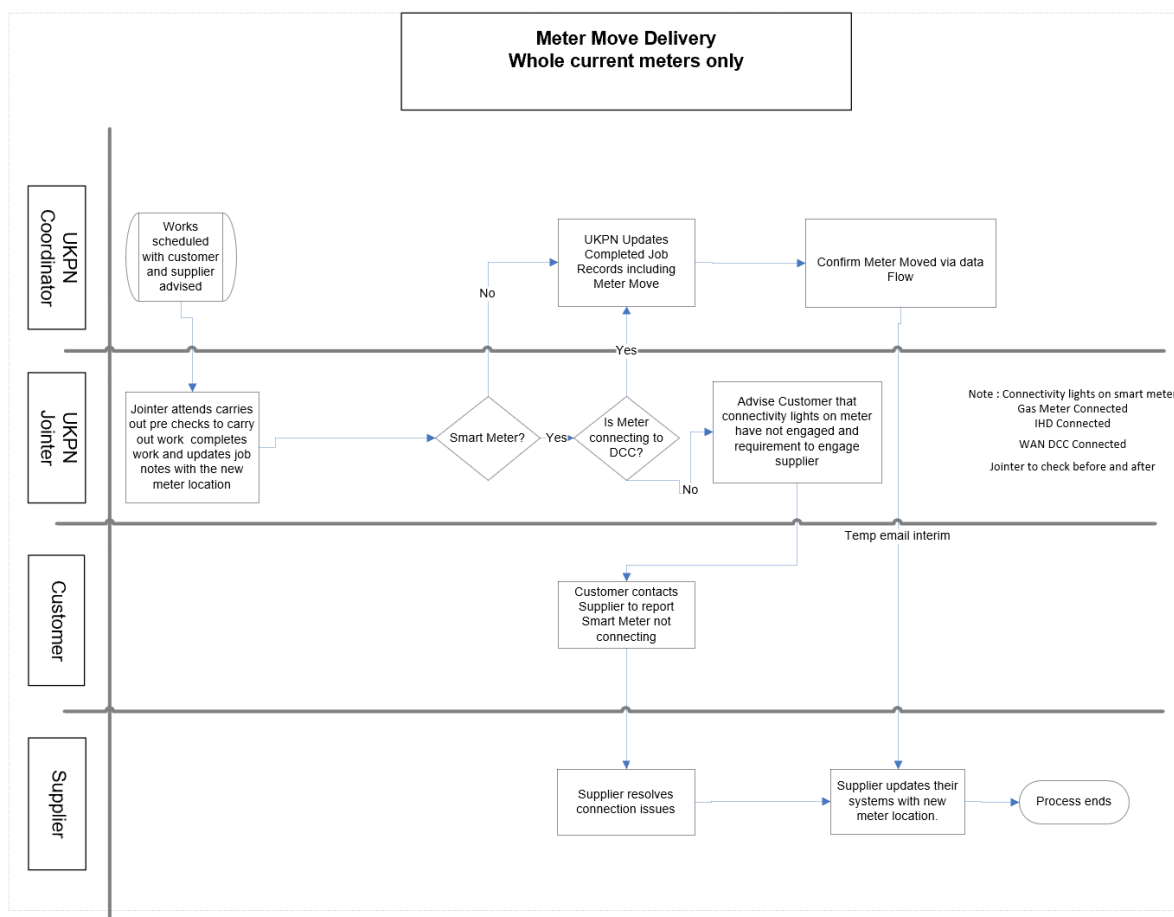
In Scope – Normal Meters	Out of Scope - Complex
Domestic & Small Industrial Commercial	5 Terminal Meters Off Peak load
Whole Current Smart & Legacy 4 terminal Meters – Credit	Meters with Separate Timeswitches
Whole Current Smart & Legacy 4 terminal Meters – Key	Contactors for off-peak load

Resin Security Meter Tails in place	SKU coms hubs
-	Whole Current 8 terminal Smart and legacy Three Phase meter
-	Whole Current Legacy with Gas first Comms Hub (in line or separate)

4.4 The Front-End Process of the expected Customer Journey is based around Customer contact and the facilitation of the quote incorporating a smart enhanced surveyor visit. The process introduces smart advice to the customer – considering Wan Han issues and the ability to enable a smart meter in the process. The Front-End Process of expected Customer Journey can be seen in short below and how the responsibilities of different Parties interact within the process.



4.5 The Delivery Process of the Customer Journey can be found in the graphic below, which shows the delivery of the meter move, including the communications to the Supplier by DNO and the recognition for smart connectivity.



4.6 Associated charging of Service Alterations will only be determined by the Party which undertakes the meter move. The Working Group noted that there are circumstances in which vulnerable customers would have meters moved for free, however, in line with information contained on the Citizens Advice Bureau website. As per Paragraph 26.4 from the Supplier License Conditions and Schedule 6, Paragraph 1 Clause 1 from the Electricity Act, disabled (Vulnerable) customers do not incur a cost if the meter-move is associated to accessibility.

4.7 Liability for Distributors if Supplier equipment is damaged was an important issue mentioned in the Ofgem responses to DCPs 019 'Moving meters with Service Alterations' and 037 'Moving Meters.' The Group agreed that there should be a mechanism to allow Suppliers to get any repair costs covered by the Distributor. The Group queried whether such a mechanism can be aligned to the Legal Text introduced into Section 2a Clause 30.18 of the DCUSA by DCP 253 'Retightening and Remaking of Whole Current Metering System Terminal Connections' stating the following:

"Where an incident arises in the course of the User (or its BSC Party Agent) or the Company undertaking work on (or in the immediate vicinity of) a Metering Point, and to the extent that it is reasonably necessary for the User and the Company to exchange information in order to resolve the incident, then the User and the Company shall exchange such information".

- 4.8 The Group agreed to take this point to their companies to confirm that it eliminates organisational concern for the Change. Throughout the production of the Change, this will also be confirmed with Ofgem that this Legal Text is satisfactory enough for any Distributor liability cover.
- 4.9 The possibility of credit being lost on Prepayment Meters (PPM) through the meter move process was highlighted in discussions. It was discussed that DNOs would likely need to make a note of the credit prior to the move. However, the consideration that meters are designed to be turned on and off without loss of functionality should also be taken into discussion.
- 4.10 Smart Meter communication functionality will also need to be tested pre and prior to the move to confirm that the Customer's service is unaltered by the service.
- 4.11 There will be training provided to Surveyors and Jointers to aid in the movement of meters. The Working Group highlighted that any training should include the following as a minimum:
- Identifying Vulnerable customers,
 - Advice to the customer that they have a choice of whether the DNO or Supplier moves their meter for in-scope arrangements. Also, consideration of Suppliers who do not want DNOs to move their meters,
 - HAN/ WAN connectivity and the effects of moving a meter,
 - Smart Meter connectivity indication,
 - In scope and out of scope meters; and
 - Advice to customers with legacy meters (i.e advice on getting a free Smart Meter installed from their Supplier.
- 4.12 The Working Group considered how this activity could be audited and whether this should be included into the existing MOCOPA DNO audit process. DNO operational assurance teams will need to be trained to facilitate internal audits on the meter move activity.
- 4.13 The Working Group noted that where Legacy meters are moved, the same guidance applied in Smart Meter moves should be followed to ensure that any future installation of a Smart Meter can successfully facilitate working with the HAN and WAN facilities. It should be noted that a Legacy meter would only be moved when a customer does not express a desire for a Smart Meter, or a one-stop shop with a later separate date for a Smart Meter installation is agreed. The use of the In-Home Display (IHD) to support any connectivity discussions and consideration of appropriate WAN and HAN strength throughout the meter move should be used.
- 4.14 The Working Group agreed that the following information should be provided to the Supplier as part of a meter move during a Service Alteration:
- Advice before the meter move and provision of the date of the intended works/ appointment,
 - Confirmation of the meter move and an update of its new location.

- 4.15 The Working Group noted that there were two existing data flows that could potentially be used for providing the above information to the Supplier (D0368 or D0215). The use of these flows will be considered by the MRA and a determination of what development would be required to make them fit for purpose. This could include the development of new flows if deemed more appropriate. It has been noted that due to the transition of MRA into the Retail Energy Code (REC) any change to existing flows or development of new flows will be delayed until after September 2021.
- 4.16 It was agreed that DNO staff carrying out the meter move activity would be equipped with the correct registered sealing pliers and seals so they can be individually identified.

Question 1 Do you understand the intent of the CP?

Question 2 Are you supportive of the principles of the CP?

Question 3 Do you believe Distributors should be liable for any damages to Supplier property in the Service Alteration process, and why?

Question 4 Do you believe Distributors need to be subject to Audit checks for Service Alterations?

Question 5 Do you believe the Supplier needs to be provided with further information?

Question 6 Will the transfer of Service Alteration information require a new DTN flow, or will the use of a current flow suffice?

Assessment Against the DCUSA Objectives

- 4.17 For a DCUSA CP to be approved it must be demonstrated that it better facilitates the DCUSA Objectives. There are five General Objectives and six Charging Objectives. DCP 383 will be measured against the DCUSA General Objectives, which are set out in the table below:

DCUSA General Objectives	Identified impact
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<input type="checkbox"/> 1 The development, maintenance and operation by the DNO Parties and IDNO Parties of efficient, co-ordinated, and economical Distribution Networks	None
<input checked="" type="checkbox"/> 2 The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity	Positive
<input type="checkbox"/> 3 The efficient discharge by the DNO Parties and IDNO Parties of obligations imposed upon them in their Distribution Licences	None
<input checked="" type="checkbox"/> 4 The promotion of efficiency in the implementation and administration of the DCUSA	Positive
<input type="checkbox"/> 5 Compliance with the Regulation on Cross-Border Exchange in Electricity and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

4.18 The Proposer believes that DCP 383 will better facilitate DCUSA General Objective 2 as it seeks to deliver a solution that rectifies an arrangement that undermines effective competition between Suppliers and Distributors.

4.19 The Proposer believes that DCP 383 will better facilitate DCUSA General Objective 4 as it seeks to deliver a solution that addresses inefficiencies in current processes that lead to avoidable errors and unnecessary risk.

Question 7 Do you have any comments on the Relevant Objectives?

QUESTION 8: Do you consider that the proposal better facilitates the DCUSA General Objectives?

- If so, please detail which General Objectives are better facilitated by DCP 383 and provide your rationale.
- If not, please detail which General Objectives are not better facilitated by DCP 383 and provide your rationale.

5 Impacts & Other Considerations

7.1 *The change should be supported by an appropriate facility for DNOs to advise Suppliers of the meter being moved.*

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

7.2 N/A

Does this Change Proposal Impact Other Codes?

BSC	<input type="checkbox"/>
CUSC	<input type="checkbox"/>
Grid Code	<input type="checkbox"/>
MRA	<input checked="" type="checkbox"/>
SEC	<input type="checkbox"/>
Other	<input type="checkbox"/>
None	<input type="checkbox"/>

Consideration of Wider Industry Impacts

- 7.3 On 12 August 2016, Ofgem approved Change Proposal 253 to change the Distribution Connection and Use of System Agreement (DCUSA) to permit a Distributor, where working on service terminations to access the meter to tighten or re-terminate meter tails including provision to remove and replace the meter in as close to the same position as practical prior to re-energisation. The legal text was not at that time, constructed to address the moving of meters by a Distributor as part of service alterations.

QUESTION 9: Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

Confidentiality

- 7.4 This Change is not confidential.

6 Implementation

- 6.1 This change will deliver customer benefits and efficiencies and Distributors would be required to make it known where this facility is offered to Suppliers to enable the resource implications on Suppliers to be managed. This will be determined from the industry consultation.

QUESTION 10: Do you have any comments that you would like the Working Group to consider related to implementing changes to the DCUSA with respect to the intent of DCP 383?

7 Legal Text

- 7.1 The Working Group will produce draft legal text depending upon the solution taken forward following this initial consultation, but it is expected that Clause 21 will require amendment as a result of this CP.

8 Code Specific Matters

Reference Documents

8.1 Not applicable.

9 Consultation Questions

9.1 The Working Group is seeking industry views on the following consultation questions:

No.	Questions
1	Do you understand the intent of the CP?
2	Are you supportive of the principles of the CP?
3	Do you believe Distributors need to be subject to Audit checks for Service Alterations?
4	Do you believe Distributors should be liable for any damages to Supplier property in the Service Alteration process, and why?
5	Do you believe the Supplier needs to be provided with further information about the Service Alteration?
6	Will the transfer of Service Alteration information require a new DTN flow, or will the use of a current flow suffice?
7	Do you have any comments on the Relevant Objectives?
8	Do you consider that the proposal better facilitates the DCUSA General Objectives?
9	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?
10	Do you have any comments that you would like the Working Group to consider related to implementing changes to the DCUSA with respect to the intent of DCP 383?

9.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than, **14 JUNE 2021.**

9.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

10 Attachments

- Attachment 1 – DCP 383 Consultation Response Form
- Attachment 2 – DCP 383 Change Proposal Form

